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# DRAMM

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August 1, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
1400 Independence Ave., SW. Room 4008  
So., Ag Stop 20250  
Washington DC 20250

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USDA NATIONAL  
ORGANIC PROGRAM  
2005 AUG 11 P 3:17

**Reference:** Review of Fish Fertilizer with allowed synthetic substances  
Point 7 Liquid Fish Products #205.601

**Position:** We urge you to continue to allow Fish Hydrolysate and Fish Emulsion  
(lowered to a pH of 3.5 with phosphoric acid or sulfuric acid as a stabilizer or  
pickling agent) as an approved input for organic crops.

**Reason:** Fish is the superior organic input fertilizer as it can be produced from 100%  
wild fish from the great lakes or from the oceans. However, fish needs to be  
stabilized or pickled to a pH of 3.5 with acid or it will putrefy. Phosphoric  
acid allows fish hydrolysate to be produced at an economical cost. Farmers  
can then afford to purchase fish hydrolysate. Farmers can also receive the  
benefit of the phosphate contained in the fish hydrolysate from the  
phosphoric acid.

Wild fish consume natural food from the sea, thus there is no contamination  
from GMO grain or beans. Phosphoric acid is an essential ingredient when  
producing fish hydrolysate from wild fish scraps.

Fish hydrolysate cannot be stabilized without lowering the pH to 3.5. We  
use feed grade phosphoric acid, which is produced from rock phosphate, a  
natural material from our earth.

Regards,

*Kurt W. Dramm*

Kurt W. Dramm  
President  
Dramm Corporation